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"I will stand for my client's rights.
I am a trial lawyer."
—Ron Motley (1944–2013)

VIA ECF

February 19, 2020

The Honorable Sarah Netburn
U.S. Magistrate Judge
United States District Court
Southern District of New York
Thurgood Marshall U.S. Courthouse
40 Foley Square
New York, NY 10007

Re: In re Terrorist Attacks on September 11, 2001
Case No. 03 MDL 1570 (GBD)(SN)
Burnett, et al. v. The Islamic Republic of Iran, et al.
Case No. 15 CV 9903 (GBD)(SN)

Dear Judge Netburn:

I submit this letter motion on behalf of Plaintiff LaShawn Dickens, as the Personal Representative of the Estate of Rodney A. Dickens who was killed while a passenger on board American Airlines Flight 77 that crashed into the Pentagon on September 11, 2001. Ms. Dickens seeks to submit materials to the Court under seal to permit the disbursement of funds from the U.S. Victims of State Sponsored Terrorism Fund arising from a judgment by this Court entered on July 31, 2017. See ECF No. 90 (in Case No. 15-cv-9903). While the underlying payments are not a settlement, per se, undersigned counsel seeks the entry of a Compromise Order that would satisfy the U.S. Victims of State Sponsored Terrorism Fund to approve a Proposed Distribution Plan and to distribute funds related to the judgment entered by this Court. Because the information contained in the materials to be submitted to the Court is personal and pertains to the affairs of an 11-year-old boy who was killed on September 11, 2001, Plaintiff LaShawn Dickens respectfully requests that the Court grant her the authority to file these materials under seal and that any Order issued by the Court also be issued under seal.

Respectfully submitted,

John M. Eubanks